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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**Karen Testerman, pro se**

**Lynn-Diane Briggs, pro se**

**Wayne Paul Saya, pro se**

**Plaintiffs**

**Vs**

**DAVID SCANLAN**

**SECRETARY OF STATE FOR NEW HAMPSHIRE, et al,**

**Defendants**

Docket No.23-cv-00499-JL-AJ

**MOTION FOR THE COURT TO TAKE JUDICIAL NOTICE  
PLAINTIFF “KAREN TESTERMAN” IS CURRENTLY CHALLENGING  
DEFENDANT CHRIS AGER COUNSEL AS A CONFLICT OF INTEREST IN  
THIS CURRENT FEDERAL COURT ACTION.**

I, Karen Testerman, pro se (“Plaintiff”) hereby requests the court to take “Judicial Notice”, in the following:

Whereas, I am the Merrimack County chairwomen and member of the Executive Committee of the New Hampshire Republican Committee.

Whereas, Defendant Chris Ager is the Chairman of the same New Hampshire Executive Committee.

Whereas, attorney Bryan K. Gould and Cleveland, Waters, and Bass, P.A. represent both Defendant Ager and the said Executive Committee.

Whereas, Defendant Ager confirmed at a recent Executive Committee meeting, while in my presence, that the Executive Committee of which he chair’s is currently being sued.

Whereas, attorney Bryan K. Gould and Cleveland, Waters and Bass, P.A., represent both Defendant Ager and me as members of the NH Republican Executive Committee, while simultaneously representing Defendant Ager in a suit of which I am a party against him.

Wherefore, I believe there is a real conflict with attorney Bryan K. Gould representing Defendant Ager while simultaneously representing my interests as a member of the same Republican Executive committee.

Therefore, I wish for the court to be aware of this conflict, and that my actions regarding said conflict are also conflicted, where I am not comfortable in taking action against “any” attorney through the Professional Conduct Committee.

**SWORN TO AND SUBSCRIBED UNDER PAINS AND PENALTIES OF  
PERJURY THIS 5<sup>th</sup> DAY OF DECEMBER, 2023.**

Respectfully submitted,

A handwritten signature in black ink that reads "Karen Testerman". The signature is fluid and cursive, with the first name "Karen" and last name "Testerman" clearly distinguishable.

Karen Testerman, Plaintiff, pro se  
9 Stone Avenue  
Franklin, New Hampshire 03235  
Karen@KarenTesterman.com  
603-934-7111

### CERTIFICATE OF SERVICE

I, Karen Testerman, pro se, have caused to deliver the named Plaintiffs the following: **Motion for the court to take judicial notice**, and the foregoing documents have been served upon the following Defendants and Plaintiffs, certified mail and U.S. postage pre-paid:

David Scanlan, Defendant  
Secretary of State of New Hampshire  
ATTENTION: Brendan Avery O'Donnell  
NH Department of Justice (Concord)  
33 Capitol St  
Concord, NH 03301  
603-271-3650  
Fax: 603-271-2110  
Email: [brendan.a.odonnell@doj.nh.gov](mailto:brendan.a.odonnell@doj.nh.gov)

Chris Ager, Defendant  
Chairman  
New Hampshire Republican Party  
ATTN: Attorney Bryan K. Gould  
Cleveland, Waters, and Bass, P.A.  
2 Capital Plaza  
Concord, New Hampshire 03302-1137  
[gouldb@cwbp.com](mailto:gouldb@cwbp.com)  
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Lynn-Diane Briggs, Plaintiff, *pro se*  
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SWORN TO UNDER PAINS AND PENALTIES OF PERJURY this 5th day of December, 2023.



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